

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

IN RE:)
)
)
NG GROUP, LLC)
)
)
Debtor)
)
)

**TRUSTEE'S MOTION FOR ENTRY OF ORDER
REQUIRING PATRICK R. BLASZ TO SHOW CAUSE WHY
HE SHOULD NOT BE FOUND TO BE IN CONTEMPT OF
COURT FOR FAILURE TO COMPLY WITH COURT ORDER**

Janet M. Meiburger, Chapter 7 Trustee, by proposed counsel, hereby moves, pursuant to Federal Rules of Bankruptcy Procedure 9014 and 9020, for entry of an order requiring Patrick R. Blasz to show cause why he should not be found to be in contempt of court for failure to comply with the Order Imposing Sanctions (Docket No. 43). In support of this Motion, the Trustee states as follows:

1. The Debtor commenced this case by filing a voluntary petition for relief under Chapter 11 of the Bankruptcy Code on May 9, 2017 (the “Petition Date”). Patrick Blasz filed the case as counsel to the Debtor.
2. This case was converted to a Chapter 7 case on December 8, 2017 (Docket No. 54). Janet M. Meiburger was appointed Chapter 7 Trustee on December 13, 2017 (Docket No. 55).

3. On July 3, 2017, the Court entered an Order Imposing Sanctions (Docket No. 43) requiring Mr. Blasz to pay the balance of the retainer paid to him by the Debtor, in the approximate amount of \$3,200.00, to the Chapter 7 Trustee when the case was converted.

4. On January 31, 2018, the Trustee mailed a letter to Mr. Blasz requesting that he send the balance of his retainer by Friday, February 9, 2018. The Trustee included a copy of the notice of her appointment as Chapter 7 Trustee along with a copy of the Order Imposing Sanctions (Docket No. 43). Mr. Blasz contacted the Trustee in response to the letter, but he has not made any payment.

WHEREFORE, Janet M. Meiburger, Chapter 7 Trustee, by proposed counsel, respectfully requests that the Court enter an order requiring Patrick R. Blasz to show cause why he should not be held in contempt of court for failure to comply with Order Imposing Sanctions (Docket No. 43).

Respectfully submitted,

THE MEIBURGER LAW FIRM, P.C.

By: /s/ Janet M. Meiburger

Dated: April 6, 2018

Janet M. Meiburger, VSB No. 31842
The Meiburger Law Firm, P.C.
1493 Chain Bridge Road, Suite 201
McLean, VA 22101
(703) 556-7871
Proposed Counsel to the Chapter 7 Trustee

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of April, 2018, I caused a true and correct copy of the foregoing Trustee's Motion for Entry of Order Requiring Patrick R. Blasz to Show Cause Why He Should not be Found to be in Contempt of Court for Failure to Comply with Court Order to be served by ECF e mail pursuant to the applicable Standing Order of the Court, and by first-class mail, postage prepaid, on the following:

Patrick R. Blasz
10224 Tamarack Drive
Vienna, VA 22182

Joseph A. Guzinski, Esq.
Office of the United States Trustee
115 South Union Street, Room 210
Alexandria, VA 22314

/s/ Janet M. Meiburger
Janet M. Meiburger